

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING MOTIONS AND
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

NOW COMES Defendant, Teresa Youngblut, through counsel, and respectfully requests that the Court extend the pretrial motions filing deadline to a date not less than ninety (90) days from the filing of this motion. The defendant also requests that the Court order that the same period be excluded from calculation under the Speedy Trial Act. This is the first motion to continue the pre-trial motions deadline. The reasons for these requests are set forth below:

I. Background.

On February 6, 2025, the defendant was indicted on one count of use of a deadly weapon against an officer or employee of the United States in violation of 18 U.S.C. §§ 111(a)(1) and 111(b), and one count of discharging a firearm during a crime of violence in violation of 18 U.S.C. § 924(c)(1)(A)(iii). The arraignment was held on February 7, 2025, and pre-trial motions were ordered to be filed by May 8, 2025. The defendant was detained and has remained in custody since their arrest January 20, 2025.

II. Bases for the Request.

The government has advised defense counsel that a supplemental discovery production is forthcoming. Based on discussions with the government, the defense anticipates this discovery production to be substantial. Also, the government has indicated that it is actively exploring

additional charges.

Additional time is needed to receive and review the newly anticipated discovery, and review and discuss it with the defendant. Additional time is also needed to conduct any necessary investigation and discuss with the government any potential non-trial resolutions in this case. Finally, additional time is needed to determine whether additional charges will be filed and whether such charges, if filed, will materially alter the trajectory of the case.

Additional time to allow the defendant and counsel to receive and review discovery, conduct investigation and conduct non-trial resolution discussions will inform defense counsel's strategic decision-making about the case, will inform counsel's evaluation of potential pretrial motions, and will inform counsel's decisions regarding said discussions with the government.

These factors all support a continuance under 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv).

The government, through Assistant United States Attorney Matthew Lasher, has no objection to the requested extension of the motions deadline.

The defendant consents to the exclusion of the time requested from the speedy trial limits set forth in 18 U.S.C. § 3161. The defendant recognizes that any additional time granted will be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

For the reasons stated above, this continuance is necessary, and the defendant submits that without a continuance they would be deprived of the time necessary for effective preparation, taking into account the exercise of due diligence.

WHEREFORE, the defendant respectfully requests that the Court grant the Defendant's Unopposed Motion to Extend Deadline for Filing Motions and to Exclude Time Under the Speedy Trial Act, and that the Court set the new date for filing motions not sooner than ninety (90) days from the filing of this motion. Finally, the defendant requests that the time between the filing of this motion and the new deadline for the filing of pre-trial motions be excluded from computation under the Speedy Trial Act.

Dated: May 8, 2025

By: /s/ Steven L. Barth
STEVEN L. BARTH
Assistant Federal Public Defender
Office of the Federal Public Defender
District of Vermont
95 Pine Street, Suite 150
Burlington, Vermont 05401
Phone: (802) 862-6990
Email: Steven_Barth@fd.org
Counsel for Teresa Youngblut